

PRIVACY POLICY

This is the privacy policy of JR 1146 Investments CC (and all entities and subsidiaries), a close corporation established in the Republic of South Africa, having its registered postal address at: PO Box 28650, Danhof, Bloemfontein, Free State, 9310, duly registered with the Companies and Intellectual Property Commission (hereinafter the “**CIPC**”) of the Republic of South Africa, under registration number: 1998/033580/23 (hereinafter “**JR**”, “**we**”, “**our**” or “**us**”). Please read these privacy terms carefully as they apply to your use of the Website under the domain name: <https://www.studentaccommodation.africa/> (hereinafter the “**Website**”) and the access, view or use of our Website, services, content, interactive features, products, system services and other digital content (collectively, the “**Service**” or “**Services**”).

1. INTRODUCTION

- 1.1 We want you to understand how we collect, use and share information about you.
- 1.2 The Consumer Protection Act 68 of 2008 (as amended from time to time) (hereinafter the “**CPA**”) and the Protection of Personal Information Act 4 of 2013 (as amended from time to time) (hereinafter “**POPIA**”) regulate the processing of your personal information.
- 1.3 This Privacy policy applies to all when you sign up for a Service with JR and when you use our Website or other digital service platforms. By using these products and Services or by providing personal information to us, you agree to the terms outlined in this Privacy policy.

2. WHAT IS PERSONAL INFORMATION?

- 2.1 Personal information means information relating to an identifiable, living, natural person and (where applicable) an identifiable, existing juristic person, including (but not limited to) the name, race, gender, marital status, address and any identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier, biometric information, photograph or image or other particular assignment to the person (hereinafter “**personal information**”).
- 2.2 Personal information in the Republic of South Africa also refers to the personal information that uniquely identifies a legal entity, such as the trading name of a company combined with the company registration number.
- 2.3 Special personal information includes information about your race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information (for example, your voice or fingerprints), any criminal behaviour that relates to alleged criminal offences or proceedings.

3. THE WEBSITE AND/OR SERVICE

- 3.1 The Website and/or Service is operated by JR.
- 3.2 Accordingly, the Website and/or Service is primarily designed for clients and other persons that are interested in JR. Given the purpose of the Website and/or Service, only limited personal information is processed in connection with it, if any. These privacy terms only govern these instances of data processing on the Website and/or Service.
- 3.3 We know that you care about how information about you is gathered and shared and we appreciate your trust in us to do this carefully and responsibly. We respect your privacy and will take all reasonable and legal measures to protect it, as more fully detailed below.
- 3.4 It is important to us that you are comfortable using the Website and/or Service, and online platform, and this Privacy Policy is intended to inform you about how we treat and process your personal information. If you do not agree to any part of this Privacy Policy, you can remove your account and cease to use JR's Website and/or Service or online platform. By signing up for an account and your continued usage of JR's Website and/or Service and online platform, you are accepting the terms of this Privacy Policy.

4. DATA CONTROLLER AND CONTACT DETAILS

- 4.1 JR is the data controller of the Website and/or Service and responsible for its operation.
- 4.2 For any data protection related comment or question you may have in connection with the Website and/or Service you can reach us at the physical address indicated above (**Attention: Privacy Compliance Officer**) or by e-mail at: admin@downtownstudentliving.co.za.

5. WHAT PERSONAL INFORMATION DO WE PROCESS?

- 5.1 As a matter of principle, JR only processes personal information that you have submitted to us. Typically, this data is limited to such things such as your name, e-mail address and/or physical address and country of residence, and sometimes also your phone number and postal address.

6. METADATA

- 6.1 When you use the Website and/or Service, we automatically collect metadata about your browsing session such as your browser, the IP address of your computer or device, your internet service provider, the site from which you navigated to the Website and/or Service, the duration of your visit to the Website and/or Service and what type of device you are using (e.g. a computer, a smart phone or a tablet and the respective operating system). We also keep a record of the pages that you view during your visit.
- 6.2 The metadata collected are used to improve the way in which our Website and/or Service operates, for statistical and systems administration purposes (which may include the security of the Website and/or Service).

7. COOKIES

- 7.1 The Website and/or Service also uses cookies. Internet cookies are common and do not harm your system - they just store or gather site information. They help you do things online, like remembering login details so you don't have to re-enter them when revisiting a site. We use cookies to:
- 7.2 **What we use cookies for:**
- 7.2.1 Gather customer journey information on our public site only;
 - 7.2.2 Temporarily store input information in our calculators, tools, illustrations and demonstrations;
 - 7.2.3 Store details of your marketing, product preferences to improve our targeting and enhance your journey through our sites and partner sites; and
 - 7.2.4 Evaluate our sites' advertising and promotional effectiveness (we own the anonymous data collected and don't share it with anyone).
- 7.3 We don't use cookies to track people's Internet usage after leaving our sites and we don't store personal information in them that others could read and understand. We will not sell or distribute cookie information without your prior consent.
- 7.4 In the event that you do accept a "cookie", you thereby consent to our use of any personal information collected by us using that "cookie" subject to the provisions of this Privacy Policy.

8. HOW AND FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?

8.1 Purpose

We collect, use and store your personal information so that we can:

- 8.1.1 Confirm your identity;
- 8.1.2 Assess your application for a product or Service;
- 8.1.3 Design, manage, price and provide our products and Services;
- 8.1.4 Make sure that our business meets your needs and provide you with customised offers, experience and service communication to help you manage your finances;
- 8.1.5 Minimise risk and identify or investigate fraud or other related activities;
- 8.1.6 Contact you when we need to tell you something important;
- 8.1.7 Screen you against any politically exposed persons or sanctions list (see Legal or regulatory obligations below);
- 8.1.8 Improve our Service to you and your experience with us; and
- 8.1.9 Manage our businesses and identify potential trends and markets to ensure that your products are future-fit.

8.2 Legal or regulatory obligations

These purposes include:

- 8.2.1 The prevention, detection, investigation and prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud and other financial crime);
- 8.2.2 Identity verification, government sanctions screening and due diligence checks;
- 8.2.3 Enforcing obligations, including without limitation, the collection of amounts outstanding from you and your provision of security for the facilities;
- 8.2.4 To comply with local or foreign law, regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation and demands of any authority, regulator, tribunal, enforcement agency or exchange body; and
- 8.2.5 We may also collect and store your personal information for reasons where the law allows us or requires us to do so.

8.3 Corresponding request

- 8.3.1 Either, you have submitted your data to us in order to access, view or use our Website and/or Services;
- 8.3.2 You have submitted your data to us since you want us to contact you in connection with a query etc.;
- 8.3.3 Or you have submitted your data to us since you subscribed to our newsletters or other publications;
- 8.3.4 To assess and deal with any requests;

- 8.3.5 Or you have submitted your data to us since you subscribed to our offerings, newsletters or other publications;
- 8.3.6 In relation to the ordering, sale and delivery of Goods;
- 8.3.7 To contact you regarding current or new Goods or Services (unless you have opted out from receiving marketing material from us) and/or to inform you of new features, special offers and promotional competitions offered by us or any of our divisions, affiliates and/or partners (unless you have opted out from receiving marketing material from us). Accordingly, we may process your personal information to enhance your personal experience of our Service channels, to ensure that you can easily navigate relevant pages and offers. You accept that using these channels and Services means that you give us permission to process your information to customise your experience, including where you choose to upload images to our digital channels. This customisation may include the display of important information relevant to your personal product holdings or products or Services that we think you may be interested in on these service channels;
- 8.3.8 To our suppliers, in order for them to liaise directly with you in the event of you submitting a warranty claim regarding any Goods you have purchased which requires their involvement;
- 8.3.9 Pursuant to a corporate transaction in terms of which we sell any of our businesses or assets to a buyer of such businesses or assets; and
- 8.3.10 We are entitled to use or disclose your personal information if such use or disclosure is required in order to comply with any applicable law, order of court or legal process served on us, or to protect and defend our rights or property.

9. ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL INFORMATION?

- 9.1 The Website and/or Service processes your personal information based on your consent. You can revoke this consent at any time (see section 14 below).

10. DATA RECIPIENTS

- 10.1 In connection with the operation of the Website and/or Service, JR uses service providers. It is conceivable that such service providers process your personal information in connection with the service provision to us (under the terms of appropriate data processing agreement).
- 10.2 From time to time we may disclose personal information to: our service providers and subcontractors, including our affiliates, retained to perform functions on our behalf or to provide services to us, such as marketing and advertising; data processing; software development; digital platform hosting and management; legal, accounting, audit and other professional service providers; and further provided such service provider does not collect, use or disclose the personal information for any purpose other than to perform such functions or to provide services to us or as otherwise required by law.

- 10.3 We are entitled to use or disclose your personal information if such use or disclosure is required in order to comply with any applicable law, order of court or legal process served on us, or to protect and defend our rights or property.

11 CROSS BORDER TRANSFERS

- 11.1 We will take all steps reasonably necessary to ensure that the third party who receives your personal information is subject to a law or binding agreement that provides an adequate level of protection.
- 11.2 Notwithstanding the above, it may occur that service providers we use in connection with the operation of the Website and/or Service may be located in or have access to your personal information from a “third country”, i.e., a country that is not recognized to possess an adequate level of data protection by the standards of South African law. In these cases, we put appropriate safeguards in place to make the respective cross border data flow lawful.

12 HOW LONG YOUR PERSONAL INFORMATION KEPT FOR?

- 12.1 We retain your personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. Therefore, personal information that we process for any purpose or purposes will not be kept for longer than is necessary for that purpose or those purposes.
- 12.2 In connection with subscription to our Services to which you have signed up to: this for example generally means that we keep your data up and until you notify us that you no longer want to obtain the respective newsletter etc.
- 12.3 Notwithstanding the above provisions of this section 12 (twelve), we may retain your personal information where such retention is necessary for compliance with a legal obligation to which we are subject or to protect your vital interests or the vital interests of another natural person.

13 SECURITY OF PERSONAL INFORMATION

- 13.1 The security of your personal information is important to us. We will take appropriate technical and organisational precautions to secure your personal information and to prevent the loss, misuse, unauthorised access, disclosure or alteration of your personal information.
- 13.2 We will store all your personal information on secure servers, personal computers and mobile devices and in secure manual record-keeping systems.
- 13.3 We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of the personal information that we hold. For example:

- 13.3.1 Access to our information systems is controlled through identity and access management controls;
 - 13.3.2 Employees and our contracted service providers are bound by internal information security policies and are required to keep information secure; and
 - 13.3.3 All employees are required to complete training about privacy and information security.
- 13.4 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer programme. You are responsible for keeping the password that you use for accessing our Website, confidential.
- 13.5 We will not ask you for your password or PIN (except when you login to our digital channels or are doing a transaction). We will not sell your personal information to other companies or organisations.

14 **YOUR RIGHTS**

- 14.1 To the extent that the POPIA applies to our processing of your personal information (or other laws that include similar rights), you have several rights, of which we would like to inform you; the right to access your data; the right of data alteration (if your data is inaccurate); the right of deletion (if the retention of your data is no longer necessary in relation to the envisioned purpose of the processing); the right to confine the data processing (e.g. if you contest the accuracy of your data that we process); the right to data portability; and the right to lodge a complaint with the relevant supervisory authority. At any time during which we process your data, you can revoke your consent to the processing by contacting JR and requesting that your data be removed.
- 14.2 JR will take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure, or access.

15 **LINKS TO EXTERNAL WEBSITE AND/OR SERVICES AND SOCIAL MEDIA CHANNELS**

- 15.1 The Website and/or Service may contain links to other Website and/or Services. JR is not responsible for the privacy practices of such other Website and/or Services.
- 15.2 The Website and/or Service contains links to the media channels of JR on social media sites (e.g. Twitter, Facebook YouTube). Typically, you will only be able to sign up to the respective JR channel if you are logged on with your user credentials to the respective social media service. The data processing on such social media sites when you visit the respective media channel of JR is subject to the privacy policies of the respective social media site operator and outside the control of JR.

- 15.3 **JR undertakes to never sell or make your personal information available to any third party other than as provided for in this policy, unless compelled to do so by law. In particular, in the event of a fraudulent online payment, JR expressly reserves the right to disclose relevant personal information for criminal investigation purposes or in line with any other legal obligation for disclosure of the personal information which may be required of it.**
- 15.4 **Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.**
- 15.5 **If you disclose your personal information to a third party, such as an entity that operates a Website and/or Service linked to this Website and/or Service or anyone other than JR. We do not regulate or control how that third party uses your personal information and accordingly, JR SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY.**

16 RIGHT TO AMEND THIS PRIVACY POLICY

- 16.1 These privacy terms are subject to amendments and changes at any time at JR's sole discretion. Accordingly, we advise that you consider the above privacy terms intermittently for updates.
- 16.2 All changes to this statement will be posted on the Website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this statement.